

REMARKS

As an initial matter, Applicants note that claims 26-38 are deemed allowable. However, claims 39-42 remain rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,325,480 to Rice ("Rice"). As discussed below, however, these claims are not anticipated by Rice which does not disclose element (b) of claims 39-42 of combining a mask pattern with the first image portion to generate an object image, wherein the mask pattern comprises background image information and first image information.

Rice is directed to producing a "texture map" generated by repeating graphical components in a toroidal pattern. For example, applying the graphic components of Figure 2 in a toroidal pattern creates the texture map of Figure 3B, which then is applied to a frame as shown in Figure 4. Figure 4 is described as "a pictorial representation of a single frame which is created from the texture map images of FIGS. 3A-3B." (Col. 2, lines 27-29.)

Rice only generally discloses applying each newly formed texture map to image frames to produce dynamically altering images. Rice, however, does not disclose the specifics of combining and blending the texture map with each scene frame and thus does not disclose element (b) of claims 39-42 of providing a *mask pattern*, for combining with Rice's texture map, that has both background image information and first image information.

Thus, Rice discloses no more than simply applying the texture map to an object and does not disclose a step of masking or blending using a mask pattern that has both background image information and first image information. Rather, the only "blending" disclosed in Rice is to help blend or feather the graphical components into the texture map itself (see Col. 2, lines 9-15).

With Rice, the creation of the texture map image based on the image blocks and offset vectors is not akin to the mask pattern in claims 39-42. In these claims, the "mask" is specifically claimed as a "mask pattern" with such "mask pattern comprising background image information and first image information." For example, mask pattern Mj of Figure 6 has both background image information 126 as well as first image information 120. This mask pattern is combined with the extracted first image portion to generate and render an object image. Applicants submit that combining a mask pattern with an image to obtain a resultant image is not the same as simply forming a texture map as in Rice in which image blocks are pasted onto an area in a repetitive pattern as shown, for example, in Figures 3B, 5B and 7B.

Thus, claims 39-42 are not anticipated by Rice, which fails to disclose each and every element of these claims. Accordingly, Applicants respectfully request that the rejection of the claims under Section 102(b) be withdrawn.

As it is believed that all of the rejections set forth in the Official Action have been fully met, favorable reconsideration and allowance of all claims are earnestly solicited.

If, however, for any reason the Examiner does not believe that such action can be taken at this time, it is respectfully requested that he telephone Applicants' attorney at (908) 654-5000 in order to overcome any additional objections which he might have.

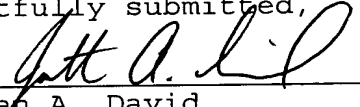
Application No.: 09/784,852

Docket No.: SCEI 3.0-045

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 12-1095 therefor.

Dated: July 13, 2004

Respectfully submitted,

By 
Jonathan A. David
Registration No.: 36,494
LERNER, DAVID, LITTENBERG,
KRUMHOLZ & MENTLIK, LLP
600 South Avenue West
Westfield, New Jersey 07090
(908) 654-5000
Attorney for Applicants

LD-447\500578_1